

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MICHAEL CARTER, et. al.)	
)	
Plaintiffs,)	Cause No. 4:23-cv-01548-CDP
)	
vs.)	
)	
THE CITY OF ST. LOUIS,)	
)	
Defendant.)	

PROPOSED JOINT SCHEDULING PLAN

Pursuant to Order Setting Rule 16 Conference [Doc. 36], Plaintiffs' counsel has prepared and Defendant's counsel has agreed, the following Proposed Joint Scheduling Plan is appropriate in this matter:

I. SCHEDULING PLAN

1. Any joinder of additional parties or amendment of pleadings shall be filed no later than **September 13, 2024**. Thereafter, the parties must file a motion for leave to join additional parties or to amend pleadings.
2. Disclosure shall proceed in the following manner:
 - (a) The parties shall make all disclosures required by Rule 26(a)(1), Fed.R.Civ.P., no later than **July 26, 2024**.
 - (b) Plaintiff shall disclose all expert witnesses and shall provide the reports required by Rule 26(a)(2), Fed.R.Civ.P., no later than **October 25, 2024**, and shall make expert witnesses available for depositions, and have depositions completed, no later than **November 22, 2024**.
 - (c) Defendant shall disclose all expert witnesses and shall provide the reports required by Rule 26(a)(2), Fed.R.Civ.P., no later than **December 6, 2024**, and shall make expert witnesses available for depositions, and have depositions completed, no later than **January 10, 2025**.

- (d) The presumptive limits of ten (10) depositions as set forth in Rule 30 (a) (2) (A), Fed.R.Civ.P., and twenty-five (25) interrogatories per party as set forth in Rule 33 (a), Fed.R.Civ.P., shall apply to Plaintiffs.
 - (e) A limit of fifteen (19) depositions, and twenty-five (25) interrogatories per Plaintiff shall apply to Defendant.
 - (f) Requests for physical or mental examinations of parties pursuant to Rule 35, Fed.R.Civ.P., are not anticipated.
 - (g) The parties shall complete all discovery in this case no later than **February 7, 2025**.
 - (h) **Motions to compel and other motions relating to discovery shall be pursued in a diligent and timely manner, but in no event filed more than fifteen (15) days following the event (e.g., failure to answer interrogatories, objections to request for production, etc.) that is the subject of the motion. Except for good cause shown, any discovery motion that is not timely filed and any discovery motion that is filed after the discovery deadline will not be considered by the Court.**
3. If ordered to complete ADR, parties shall do so no later than **November 29, 2024**.
4. Any motion to dismiss, motion for summary judgement or motion for judgement on the pleadings shall be filed no later than **March 7, 2025**. The response in opposition to such a motion shall be due thirty days later, or no later than **April 11, 2025**; the reply in support of the motion shall be due ten days after the response, or no later than **April 25, 2025**.

II. ORDER RELATING TO TRIAL

This action is set for a NON-JURY trial on **August 11, 2025**, at **9:30 a.m.** This action should take no more than five (5) days of trial.

SHEENA HAMILTON,
CITY COUNSELOR

/s/ Korey Lewis

Korey Lewis, NO: 68203MO
Associate City Counselor
City Hall, Room 314
St. Louis, Missouri 63103
Telephone: 314-622-3366

Attorney For Defendant

Respectfully submitted,

HARTNETT REYES-JONES, L.L.C.

/s/ Daniel J. Sparks

James P. Faul, NO: 58799MO
Daniel J. Sparks, NO: 75348MO
4399 Laclede Ave.
St. Louis, Missouri 63108
Telephone: 314-531-1054
Facsimile: 314-531-1131

Attorneys For Plaintiffs